

## Greene, Flora

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**From:** Craig Kish <ckish@toeroek.com>  
**Sent:** Friday, April 11, 2014 11:16 AM  
**To:** Greene, Flora  
**Cc:** Hubner, Tara; Mayer, Richard; Paul Kieler; Malooly, Tom  
**Subject:** 6609 Gregg County Refining - plan to recover the schedule next week  
**Attachments:** removed.txt

Good morning Flora,

We are behind our planned schedule at Gregg County Refining and plan to add local, qualified support next week to complete all work. Our original plan was to start with well installation and development and then to add soil/sediment/groundwater sampling as the sampling crew mobilized later, but we are trying to compress everything within two weeks. Also, we wanted to compress fieldwork to two weeks so that we did not have crew returning after the holiday weekend (4/19 – 4/21). But this required more concurrent activities spreading folks thin; also, the heavy rains made for a slow start and access to many locations difficult.

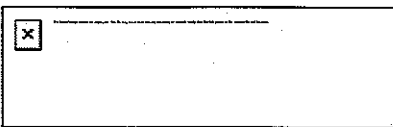
To mitigate, we're working to get field support from a local environmental firm with appropriately trained and experienced sampling staff to provide additional support next week under the supervision and direction of our tech lead, Paul Kieler. The plan is:

- Monday - two trained sediment samplers arrive to collect the sediment samples; we will complete the subsurface soil sample collection on Monday also.
- Tuesday and Wednesday - two additional field staff will work with our crew to finish the groundwater sampling (i.e., we will have two, two-person sampling teams, so one person from Toeroek will lead each sampling team with support from the local staff).
- Thursday - local staff will be available on Thursday also as needed to complete final sampling, such as the IDW sampling. All samples will be shipped to the EPA lab for Friday receipt.
- Friday – our crew will demobilize, including land surveying of the monitoring wells.

This will allow us to complete on time without having to extend the access agreements or to go beyond the EPA lab schedule. Also, use of the local staff saves per diem costs and avoids having us go across the long weekend (4/19 – 4/21), which would cause us to fly the crew home and back out, saving additional travel costs.

I have reviewed the actuals to-date and projected out the estimate to complete to determine the estimate at completion. This will be very tight, but we are closely managing costs to be as cost-effective as possible while we complete the scope (e.g., reducing travel and per diem costs). We are also concerned about the additional IDW that is being generated beyond our estimates, the additional time caused by the rains upon arriving at the site, the change in plans for sediment sampling caused by the rains, longer than anticipated time to develop monitoring wells, and other unanticipated delays.

Thanks!  
Craig



Craig Kish  
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**King, Laurie**

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**From:** Greene, Flora  
**Sent:** Tuesday, April 15, 2014 1:37 PM  
**To:** Hubner, Tara; King, Laurie  
**Cc:** Pham, Anhmai  
**Subject:** FW: Follow-up Call to TOEROEK re: TO 6609 Gregg County Refining Sampling Event

He said that he had gotten a report from PAUL regarding SUSAN.  
I don't remember saying anything about the owners' "technical representatives?"

Thinking back, I didn't mention the familiarity with SCRIBE or the ruts.

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**From:** Craig Kish [mailto:ckish@toeroek.com]  
**Sent:** Tuesday, April 15, 2014 12:58 PM  
**To:** Greene, Flora  
**Cc:** Gatling, Tia; Hubner, Tara; Mayer, Richard; Jacques, Wendy; Davis, Derek; Kim Shultz; Paul Kieler  
**Subject:** RE: Follow-up Call to TOEROEK re: TO 6609 Gregg County Refining Sampling Event

Thank you Flora. I will stress to the field crew the importance of QC, proper and complete documentation, and following procedures carefully, as well as that we should be polite to the owner and his technical representatives and only listen but not volunteer information or discuss technical issues.

Cheers!

Craig

Craig Kish  
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[t] 303.407.0263

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**From:** Greene, Flora [mailto:Greene.Flor@epa.gov]  
**Sent:** Tuesday, April 15, 2014 11:30 AM  
**To:** Craig Kish  
**Cc:** Gatling, Tia; Hubner, Tara; Mayer, Richard; Jacques, Wendy; Davis, Derek; Kim Shultz; Paul Kieler  
**Subject:** Follow-up Call to TOEROEK re: TO 6609 Gregg County Refining Sampling Event

Confirming our follow-up call on April 15, 2014

Good News! Heard from the field that things are running smoothly after some challenges last week.

- Top-notch Geologist in the field, doing some excellent work getting the soil borings re-done --with the wells and
- Also hear that you have additional personnel/subcontractors in the field --we appreciate that

REMINDERS:

The importance of quality control, your SOP's and QAPP should apply

The importance of documentation, both your daily actions in writing and in pictures

## The importance of gauging wells before sampling

### Two Observations:

- Junior Scientist/Data Manager appears to have less experience that EPA would have hoped.
- Subcontractors conversing with facility owner - Our attorneys have advised that we should "just listen."

Appreciate your attention and your assurance that all concerns have been addressed and will continue to be monitored.

Thanks, again.

*Flora S. Greene*

Senior Project Officer for RCRA

Region 6, 6PD- M

214-665-8428

We are not inheriting our environment from our fathers.

We are borrowing it from our grandchildren.

--Native American saying

**King, Laurie**

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**From:** Greene, Flora  
**Sent:** Monday, April 21, 2014 11:04 AM  
**To:** Shultz, Kim; Malooly, Tom; Craig Kish  
**Cc:** Mayer, Richard; Jacques, Wendy; Gatling, Tia; Davis, Derek; Pham, Anhmai  
**Subject:** DeBrief with Contractor: TOEROEK on Gregg County at 2pm CDST, Monday, Call-in number is 214-665-9790

Pardon the many emails—just trying to coordinate as much attendance as possible.

The DeBrief is scheduled for TODAY, at 2pm. KIM and TOM, you are welcome to join us on the 6<sup>th</sup> floor or to call-in, as follows:

R6-BL-2146659790-6P/Conf-Bridge-Ln/R6-Res; [R6-ConfRm-CypressTree-06002@epa.gov](mailto:R6-ConfRm-CypressTree-06002@epa.gov)

The debrief is just a report-out of how things went, talk about any lessons learned and/or any concerns or needed follow-up.

Thank you,

*Flora S. Greene*

Senior Project Officer for RCRA  
Region 6, 6PD- M  
214-665-8428

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**King, Laurie**

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**From:** Greene, Flora  
**Sent:** Tuesday, April 22, 2014 4:16 PM  
**To:** Mayer, Richard; Jacques, Wendy; Pham, Anhmai; King, Laurie  
**Subject:** Memo to File: Gregg County Mobilization De-Brief with TOEROEK on 4/21/14

LADIES and GENTLEMAN, please review, make any additions or deletions as needed and get back to me by Thursday, COB. I am going to put this in the file.

Background:

TOEROEK had some challenges during the first couple of days, specifically having to re-sample after first day's samples were shipped with chain of custody mix-ups. By the third day, it was obvious that the team presently in the field would not be able to maintain the schedule. (Note: Facility owner had insisted upon specific timeframe in the access agreements.) TOEROEK decided to bring on additional subcontractor personnel.

Participants:

TOEROEK/K. Shulz and T. Malooly attended in person with C. Kish on the phone  
REG 6-RCRA/L. King, W. Jacques, R. Mayer and myself

All participants introduced, then invited Contractor to report out: how did things go, lessons learned, any concerns or follow-up needed.

CRAIG KISH began with the following list of things (lessons learned\_, TOM MALOOLY added details and re-enforcement along the way:

- Quality Control (proper documentation, taking photos)
- Overcommitted (overly aggressive to recover)
- Identify and Address Issues Early On
- Have a Review of the Day Session
- General Field Planning Needs Work (Be Smart: back-to-back QC samples)
- Adequately Support the Site Manager (with personnel and communication)

TOEROEK also mentioned that problems with their printer while using SCRIBE (lab labeling software) and recent RAINS were factors. Due to rain some well locations were changed and additional effort needed to clean equipment after drilling due to sticking soil/mud.)

EPA TOCORs Field Team's consensus was that TOEROEK performed well, is hardworking and conscientious, recovered very well from challenges of the first couple of days.

[It's not how you start, its how you finish?]

*Flora S. Greene*  
Senior Project Officer for RCRA  
Region 6, 6PD- M  
214-665-8428

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